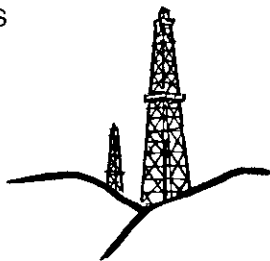


BOARD OF TRUSTEES

David Cooper  
Dennis Murphy  
Carl Twisselman II



**McKittrick School District**

P.O. Box 277 • 23250 2nd Street  
McKittrick, CA 93251  
661-762-7303 • Fax 661-762-7283

**DOCKET FILE COPY ORIGINAL**

SUPERINTENDENT  
PRINCIPAL  
Barry Koerner

Received & Inspected

**MAR 20 2008**

FCC Mail Room

March 14 2008

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**CC: 02-6**

To Members of:  
Federal Communications Commission Appeals Board

This letter is to appeal the decision of the USAC (Universal Service Administrative Company) classification status of our School District in regards to Rural/Urban area for E-Rate Funding. Both last year and this year the USAC has changed our District status to urban versus what we should be logically classified as rural. This small School District consists of 72 kids, Kindergarten through 8<sup>th</sup> grade and is approx. 50 miles from Bakersfield out in the middle oil fields. I have attached the same information that was given to the USAC. In it you will see attached maps and information that clearly justifies the Rural Classification. You will also have the information that shows tracts in our county. The numbers to those tracts and the fact that some of the numbers they (USAC) use do not in fact exist ( ie: 0033.01). I have also shown on the colored maps the tract as well as our district in relationship to the tract. Our district is the north western corner of our tract as well as into the next tract above. You can see by the black and white map that I have highlighted every tract they consider rural in our county. However because the tract our district is approx. 65 miles long and 15 miles wide. It places the farthest end of the tract close to Bakersfield. That in turn makes us urban. I have talked to both the US census for Federal and State, as you can see by my letter to USAC dated Feb. 20 2008. The US Census bureau links to the NCES (National Center for Educational Statistics) this information clearly shows us as Rural. It would seem that there needs to be a more universal way to determine the status besides ambiguous tracts that are inconsistent and have no true relevance to the areas classification. The system presently used is flawed in several ways and penalizes those who really are the ones that should be benefitting from this program. I hope that you will be able to review this information and come up with the same conclusion. If you have any questions please feel free to contact me anytime on my cell or at the school. I thank you in advance for your cooperation in this matter.

Sincerely

A handwritten signature in black ink, appearing to read 'Jon Rubadeau'.

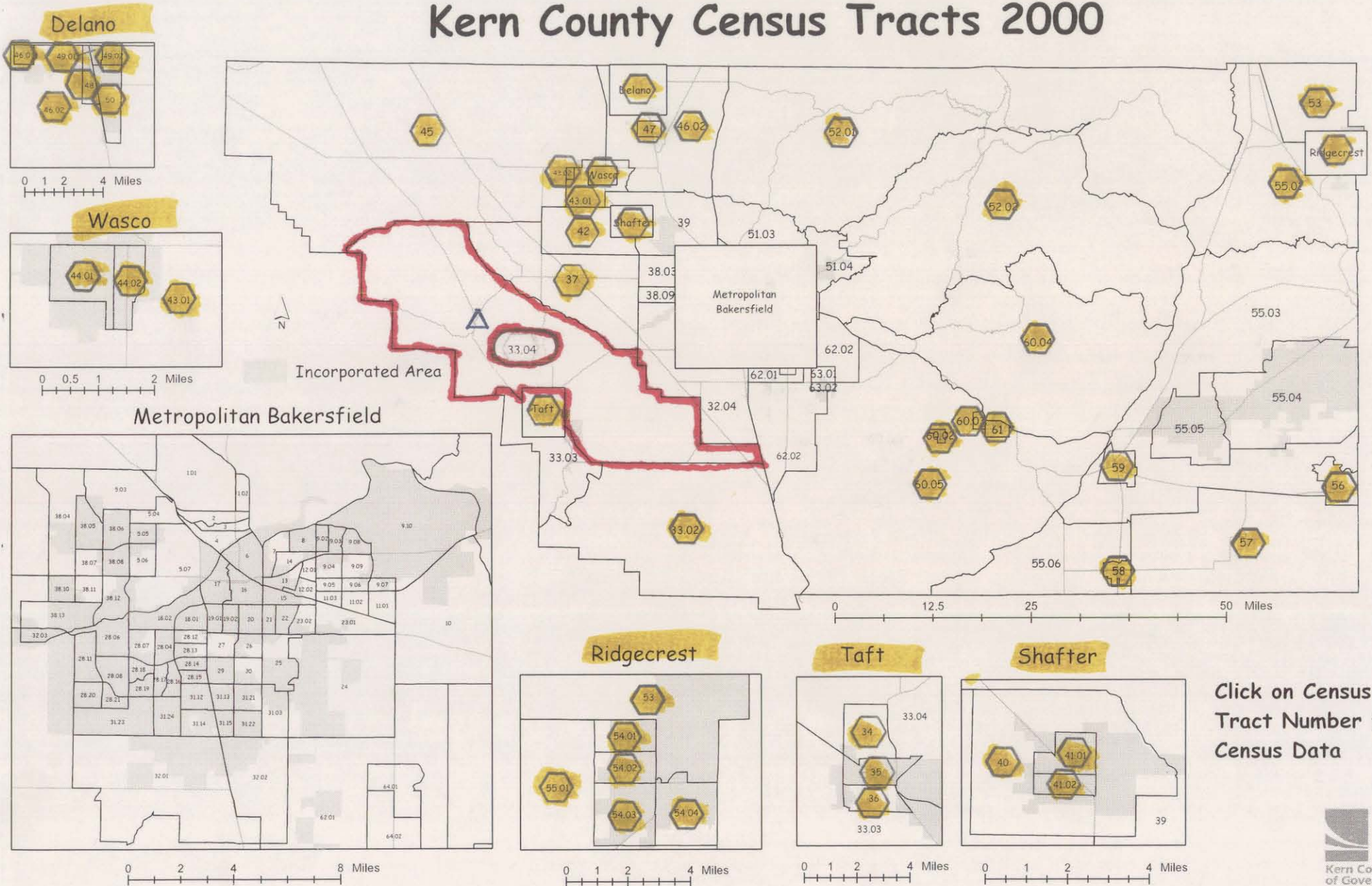
Jon Rubadeau  
MOT Director  
McKittrick School District  
McKittrick, CA. 93251  
Cell # 661-301-5407 School # 661-762-7303

No. of Copies rec'd 0 + 1  
List A B C D E

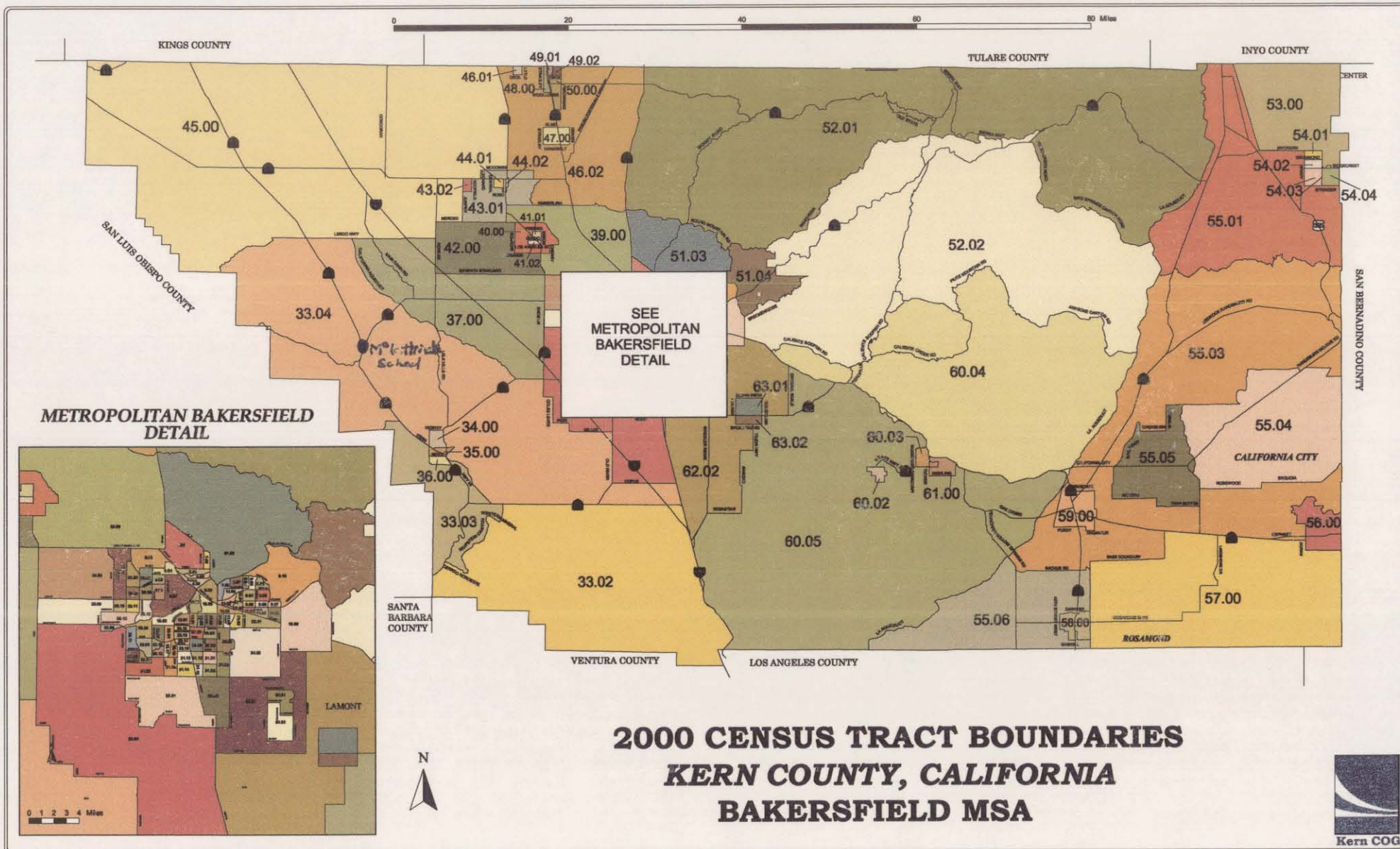
△ = Town of McKittrick

⬡ = Tracts Which USAC Consider Rural

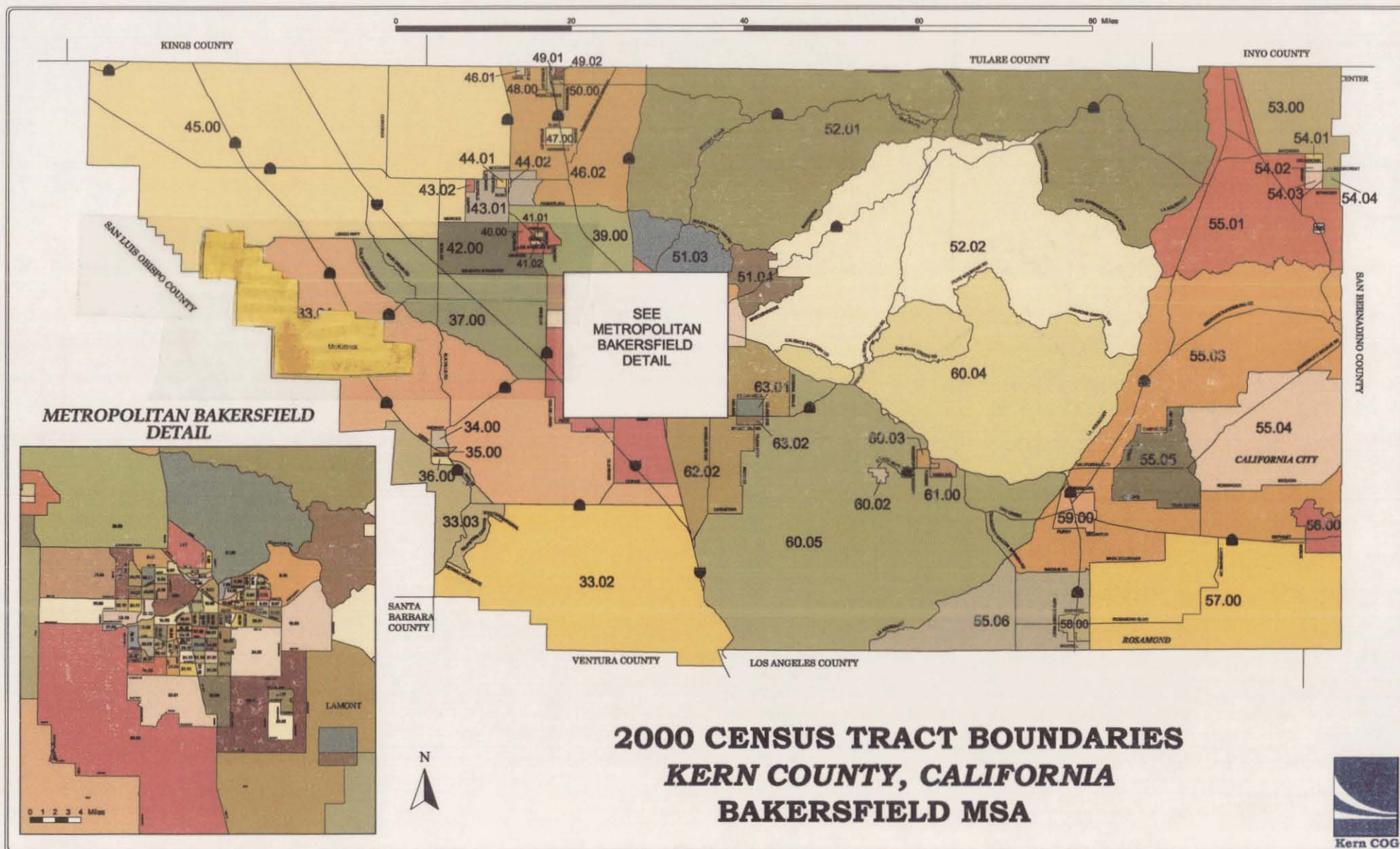
## Kern County Census Tracts 2000



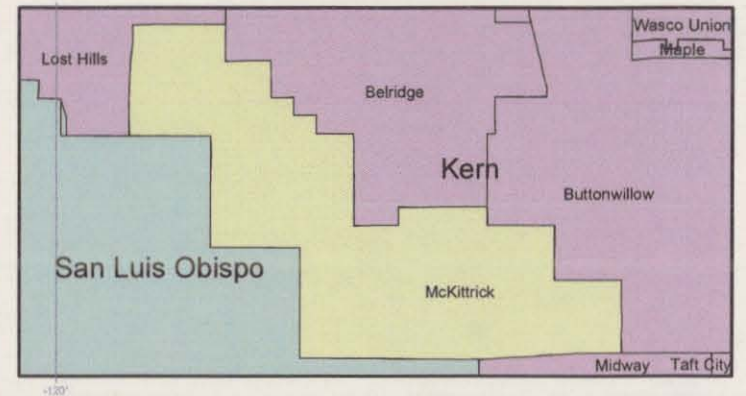
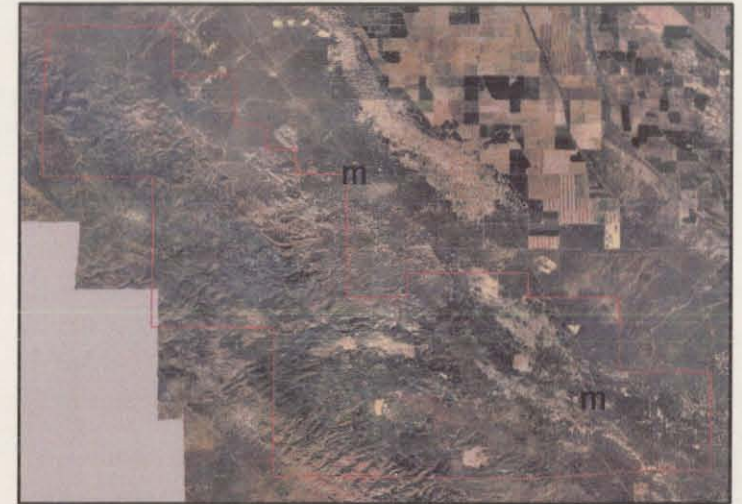
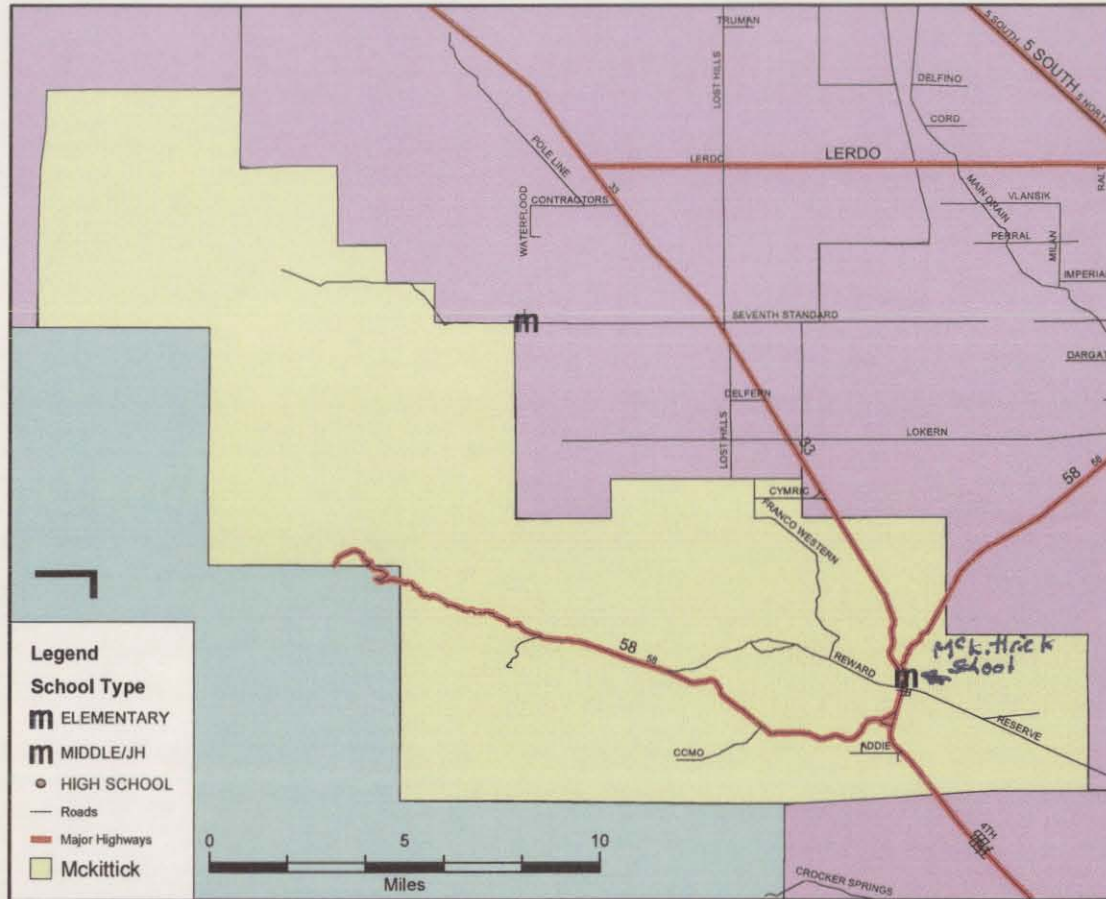












Source: County of Kern GIS, Air Photo USA  
Created in ArcGIS 8 using ArcMap

Warning: The information contained hereon was created by the KCSOS Research Department Geographic Information System (GIS), which is designated and operated solely for the convenience of the Kern County Schools and related contract entities. KCSOS does not warrant the accuracy of this information, and no decision involving a risk of economic loss or physical injury should be made in reliance thereon.

## McKittrick School District McKittrick Elementary 2004

Office of Larry E. Reider  
Kern County Superintendent of Schools  
Research Services Department GIS  
October 2004

State Plane Coordinate System  
California Zone IV - NAD 27





## Search for Public Schools

**CCD** Common Core of Data

### Search Information

**School Name:**  
Mckittrick Elementary

**Mailing Address:**  
Box 277  
Mckittrick, CA 93251-0277

### Search Results   Modify Search   Data Notes/Grant IDs   Help

**District Name:**  
Mckittrick Elementary  
district information

**Physical Address:**  
23250 Second ST.  
Mckittrick, CA 93251-0277

**County:**  
Kern  
schools in county

**Phone:**  
(661) 762-7303

<b>NCES District ID:</b>	<b>NCES School ID:</b>	<b>State District ID:</b>	<b>State School ID:</b>
0624330	062433003653	1563651	6009773

### School Characteristics

**Grade Span:** (grades KG - 8)  
KG 1 2 3 4 5 6 7 8

**Total Students:** 66  
**Classroom Teachers (FTE):** 4.0  
**Student/Teacher Ratio:** 16.5

**Type:** Regular school  
**Old Locale:** Rural, inside CBSA (8)  
**New Locale:** Rural: Remote (43)  
**Status:** Currently operational

**Charter:** no   **Magnet:** no   **Title I School:** yes   **Title I School-Wide Program:** no

### Enrollment Characteristics

#### Enrollment by Grade:

	<b>KG</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>
Students	3	1	9	5	10	8	8	10	12

#### Enrollment by Race/Ethnicity:

	<b>Amer Ind/ Alaskan</b>	<b>Asian</b>	<b>Black</b>	<b>Hispanic</b>	<b>White</b>
Students	3	0	0	10	53

#### Enrollment by Gender:

	<b>Male</b>	<b>Female</b>	<b>Unknown</b>
Students	34	32	0

**Free lunch eligible:** 7   **Reduced-price lunch eligible:** 2   **Migrant Students:** 0

Note: Details may not add to totals.

Source: CCD Public school data 2005-2006 school year

Note: "N A" means the data are not available or not applicable.

**National Center for Education Statistics**  
Office of Educational Research & Improvement, U.S. Dept. of Education  
1990 K Street, NW, Washington, DC 20006, USA, Phone: (202) 502-7300

# USAC

Universal Service Administrative Company

## Schools and Libraries

### About the Schools and Libraries Program

- Overview of the Program
- Overview of the Process
- Training Presentations
- Service Provider Conference Calls
- Eligible Services List
- Appeals
- Audits
- Suspensions and Debarments
- Update Contact Information
- Document Retention Requirements
- Site Visits
- Changes and Corrections
- Commitment Adjustment (COMAD)

### Schools and Libraries Tools

- Apply Online
- Calendar/Reminders
- Required Forms
- Reference Area
- Search Tools
- Program Compliance - Whistleblower Hotline

SL Main > Reference Area > Rural/Urban Classification > California - MSA Lookup

## California

**Alpine**  
**Amador**

**Butte**  
\*ONLY in 0024-0036

**Calaveras**  
**Colusa**

**Del Norte**

**El Dorado**  
\*ONLY in 0301.01, 0301.02, 0302, 0303, 0304.01, 0304.02, 0305.01, 0305.02, 0305.03, 0306, and 0310-0315

**Fresno**  
\*ONLY in 0040, 0063, 0064.01, 0064.03, 0065-0068, 0071-0074, 0078-0083, 0084.01, and 0084.02

**Glenn**

**Humboldt**

**Imperial**  
**Inyo**

**Kern**  
\*ONLY in 0033.01, 0033.02, 0034-0037, 0040-0050, 0051.01, 0052-0054, 0055.01, 0055.02, 0056-0061, and 0063  
**Kings**

**Lake**  
**Lassen**  
**Los Angeles**

\*ONLY in 5990, 5991, 9001, 9002, 9004, 9012.02, 9100, 9101, 9108.02, 9109, 9110, 9200.01, 9201, 9202, 9203.03, and 9301

**Madera**  
\*ONLY in 0001.02-0001.05, 0002-0004, 0010, 0011.98, and 0012.98

**Mariposa**  
**Mendocino**

**Merced**  
\*ONLY in 0001, 0002, 0003.01, 0004, 0005.01, 0005.02, 0006, 0007, 0008, 0019.98, 0020, 0021.98, 0022, 0023.01, 0024, and 0024.75-0024.98

**Modoc**

**Mono**

**Monterey**  
\*ONLY in 0109, 0112, 0113, 0114.01, 0114.02, and 0115

**Nevada**

**Placer**  
\*ONLY in 0201.01, 0201.02, 0202, 0203, 0204, 0216, 0217, 0219, and 0220

**Plumas**

**Riverside**  
\*ONLY in 0421, 0427.02, 0427.03, 0429, 0430, 0431, 0432, 0444, 0452.02, 0453, 0454, 0455, 0456.01, 0456.02, 0457.01, 0457.02, 0458-0462

**San Benito**  
**San Bernardino**

\*ONLY in 0097.03, 0097.04, 0098, 0099, 0100.01, 0089.01, 0089.02, 0090.01, 0090.02, 0091.01, 0091.02, 0093, 0094, 0095, 0096.01, 0096.02, 0096.03, 0097.01, 0100.02, 0102.01, 0102.02, 0103, 0104.01, 0104.02, 0104.03, 0105, 0106, and 0107

**San Diego**

\*ONLY in 0189.01, 0189.02, 0190, 0191.01, 0208, 0209.01, 0209.02, 0210, 0212.01, 0212.02, and 0213

**San Joaquin**

\*ONLY in 0040, 0044, 0045, 0052.01, 0052.02, 0053.02, 0053.03, 0053.04, 0054, and 0055

**San Luis Obispo**

\*ONLY in 0100, 0101, 0102, 0103, 0104, 0105, 0106, 0107.01, 0107.02, 0108, 0114, 0118-0122, 0124, 0125, 0126, 0127.01, and 0127.02

**Santa Barbara**

\*ONLY in 0018, 0019.03

**Santa Clara**

\*ONLY in 5117.04, 5118, 5125.01, 5127

**Shasta**

\*ONLY in 0126, 0127, 1504

**Sierra**

**Siskiyou**

**Sonoma**

\*ONLY in 1506.04, 1537.01, 1541, 1542, 1543

**Stanislaus**

\*ONLY in 0001, 0002.01, 0032, 0033, 0034, 0035, 0036.05, 0037, 0038, 0039.01, and 0039.02

**Tehama**

**Trinity**

**Tulare**

\*ONLY in 0002-0007, 0026, 0028, 0040, 0043, and 0044

**Tuolumne**

**Ventura**

\*ONLY in 0001, 0002, 0046, 0075.01

Content Last Modified: May 2, 2003

Kern County Population Estimate by Census Tract						
Geogarphy	Census April 1, 2000			Controlled to Jan. 1, 2006		
	Population	GP Quarter	Household	Population	GP Quarter	Household
Tract 1.01	7,843	79	7,764	10,620	79	10,541
Tract 1.02	2,975	5	2,970	2,977	5	2,972
Tract 2	7,543	-	7,543	7,606	-	7,606
Tract 3	4,010	-	4,010	4,051	-	4,051
Tract 4	4,188	41	4,147	4,226	41	4,185
Tract 5.03	3,224	-	3,224	6,186	-	6,186
Tract 5.04	4,177	24	4,153	4,345	24	4,321
Tract 5.05	4,083	9	4,074	4,115	9	4,106
Tract 5.06	1,270	-	1,270	1,405	-	1,405
Tract 5.07	1,540	38	1,502	3,531	38	3,493
Tract 6	7,026	569	6,457	7,058	569	6,489
Tract 7	4,701	16	4,685	4,735	16	4,719
Tract 8	4,629	6	4,623	4,638	6	4,632
Tract 9.02	3,439	6	3,433	3,441	6	3,435
Tract 9.03	4,010	27	3,983	4,019	27	3,992
Tract 9.04	3,967	228	3,739	3,992	228	3,764
Tract 9.05	2,236	-	2,236	2,239	-	2,239
Tract 9.06	3,865	7	3,858	3,888	7	3,881
Tract 9.07	2,208	-	2,208	2,310	-	2,310
Tract 9.08	4,949	31	4,918	5,132	31	5,101
Tract 9.09	2,445	-	2,445	2,545	-	2,545
Tract 9.10	7,307	85	7,222	7,905	85	7,820
Tract 10	5,353	-	5,353	7,351	-	7,351
Tract 11.01	4,050	79	3,971	4,066	79	3,987
Tract 11.02	6,096	54	6,042	6,127	54	6,073
Tract 11.03	3,854	64	3,790	3,897	64	3,833
Tract 12.01	3,082	344	2,738	3,108	344	2,764
Tract 12.02	5,799	152	5,647	5,845	152	5,693
Tract 13	7,194	31	7,163	7,279	31	7,248
Tract 14	7,321	329	6,992	7,408	329	7,079
Tract 15	2,772	195	2,577	2,803	195	2,608
Tract 16	1,590	349	1,241	1,383	76	1,307
Tract 17	4,366	111	4,255	4,388	111	4,277
Tract 18.01	5,699	204	5,495	5,723	204	5,519
Tract 18.02	5,405	23	5,382	5,459	23	5,436
Tract 19.01	3,619	-	3,619	3,630	-	3,630
Tract 19.02	4,668	49	4,619	4,693	49	4,644
Tract 20	6,197	192	6,005	6,263	192	6,071
Tract 21	3,724	227	3,497	3,800	227	3,573
Tract 22	5,707	20	5,687	6,059	20	6,039
Tract 23.01	7,693	-	7,693	9,347	-	9,347
Tract 23.02	2,659	-	2,659	2,766	-	2,766
Tract 24	2,285	7	2,278	4,915	7	4,908
Tract 25	7,117	12	7,105	7,546	12	7,534
Tract 26	3,183	20	3,163	3,207	20	3,187
Tract 27	5,194	47	5,147	5,240	47	5,193
Tract 28.04	2,742	67	2,675	2,744	67	2,677
Tract 28.06	1,940	177	1,763	1,948	177	1,771
Tract 28.07	4,064	23	4,041	4,128	23	4,105
Tract 28.08	7,391	10	7,381	7,516	10	7,506
Tract 28.11	2,381	-	2,381	4,445	-	4,445
Tract 28.12	5,156	-	5,156	5,164	-	5,164
Tract 28.13	3,993	94	3,899	3,997	94	3,903
Tract 28.14	4,266	44	4,222	4,286	44	4,242



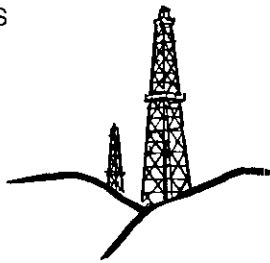
Kern County Population Estimate by Census Tract						
Geogaphy	Census April 1, 2000			Controlled to Jan. 1, 2006		
	Population	GP Quarter	Household	Population	GP Quarter	Household
Tract 28.15	4,085	11	4,074	4,085	11	4,074
Tract 28.16	5,390	63	5,327	5,390	63	5,327
Tract 28.17	4,927	11	4,916	4,927	11	4,916
Tract 28.18	4,259	31	4,228	4,264	31	4,233
Tract 28.19	4,706	5	4,701	4,709	5	4,704
Tract 28.20	3,477	18	3,459	6,029	18	6,011
Tract 28.21	4,520	14	4,506	4,910	14	4,896
Tract 29	6,662	10	6,652	6,671	10	6,661
Tract 30	6,629	30	6,599	6,700	30	6,670
Tract 31.03	3,551	7	3,544	3,584	7	3,577
Tract 31.12	5,042	6	5,036	5,056	6	5,050
Tract 31.13	4,007	101	3,906	4,408	101	4,307
Tract 31.14	6,987	124	6,863	7,278	124	7,154
Tract 31.15	5,250	11	5,239	5,302	11	5,291
Tract 31.21	7,359	25	7,334	7,366	25	7,341
Tract 31.22	7,239	6	7,233	7,886	6	7,880
Tract 31.23	5,219	7	5,212	11,907	7	11,900
Tract 31.24	4,618	195	4,423	5,436	195	5,241
Tract 32.01	6,061	14	6,047	15,598	14	15,584
Tract 32.02	7,396	-	7,396	12,622	-	12,622
Tract 32.03	2,578	6	2,572	2,642	6	2,636
Tract 32.04	1,532	-	1,532	7,558	-	7,558
Tract 33.02	7,051	-	7,051	7,816	-	7,816
Tract 33.03	1,495	32	1,463	1,532	32	1,500
Tract 33.04	5,521	2,856	2,665	5,784	2,877	2,907
Tract 34	3,557	-	3,557	3,589	-	3,589
Tract 35	5,690	140	5,550	5,885	140	5,745
Tract 36	4,068	-	4,068	4,175	-	4,175
Tract 37	3,038	15	3,023	3,430	15	3,415
Tract 38.03	2,456	13	2,443	3,947	13	3,934
Tract 38.04	3,842	-	3,842	14,052	-	14,052
Tract 38.05	4,032	3	4,029	8,012	3	8,009
Tract 38.06	1,908	-	1,908	5,134	-	5,134
Tract 38.07	3,799	5	3,794	3,859	5	3,854
Tract 38.08	3,671	-	3,671	4,456	-	4,456
Tract 38.09	5,302	-	5,302	9,666	-	9,666
Tract 38.10	2,578	-	2,578	2,857	-	2,857
Tract 38.11	2,173	-	2,173	2,409	-	2,409
Tract 38.12	3,701	12	3,689	3,848	12	3,836
Tract 38.13	2,316	15	2,301	8,518	15	8,503
Tract 39	3,130	2,416	714	3,149	2,416	733
Tract 40	4,279	73	4,206	6,322	73	6,249
Tract 41.01	4,192	133	4,059	4,310	133	4,177
Tract 41.02	5,315	461	4,854	5,400	492	4,908
Tract 42	1,149	-	1,149	1,184	-	1,184
Tract 43.01	3,810	10	3,800	6,184	10	6,174
Tract 43.02	6,201	6,201	-	6,381	6,381	-
Tract 44.01	6,610	-	6,610	6,792	-	6,792
Tract 44.02	5,065	8	5,057	5,161	8	5,153
Tract 45	3,418	17	3,401	3,605	17	3,588
Tract 46.01	454	393	61	454	393	61
Tract 46.02	10,858	5,078	5,780	19,082	8,555	10,527
Tract 47	10,135	1,288	8,847	11,450	1,307	10,143
Tract 48	7,939	30	7,909	8,356	30	8,326

NO  
33.01  
11



BOARD OF TRUSTEES

David Cooper  
Dennis Murphy  
Carl Wisselman II



**McKittrick School District**

P.O. Box 277 • 23250 2nd Street  
McKittrick, CA 93251  
661-762-7303 • Fax 661-762-7283

SUPERINTENDENT  
PRINCIPAL  
Barry Koerner

Hi Catherine Chen

Feb. 20 2008

Here is the information I have so far on the rural versus urban. You will notice the first two pages are from the National Center for Education Statistics this was where I was directed to by Doug Gevert of the US Census Bureau (national). Doug deals with the school and school district classifications among things with regards to census data. He explained to me that we are a rural school and does not understand why USAC uses tracts as they are not uniform like blocks sections which is what they reduce down to. The tract like ours which covers a 62 mile long by 15 miles wide with the southern area near Bakersfield is a prime example why this does not work. As you can see on the map I circled where McKittrick is. On the next map I have circled every tract in the county that is listed as rural on your site. You will notice it is the majority of Kern County. You will see that there is basically every district around and between McKittrick and Bakersfield is rural. Have also contacted Tim Monagla of the California Side of the Census and he also could not understand why tract are used. I will be sending him this information so he may be able to help resolve this also. Last but not least I have included the USAC page that lists kern county Tracts where it indicates 0033.01 0033.02 then 0034-0037 the next three pages following that show all the Tracts in Kern County. On that second page you will notice there is no 0033.01 listed anywhere in all of Kern County. I hate to be a burden and would really appreciate any assistance you may be able to give. Thank you in advance for your cooperation

Sincerely

A handwritten signature in black ink, appearing to read 'J. Rubadeau'.

Jon Rubadeau  
MOT Director  
McKittrick School District